



UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

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MICHAEL W. DOBBINS

CLERK, U.S. DISTRICT COURT

Plaintiff

Angela Marie Smith

Case No. 08CV3405

V.

Assigned Judge: Zagel

Defendants

Magistrate Judge: Nolan

Board of Education of the
City of Chicago

AMENDED COMPLAINT

That Defendant discharged Plaintiff in retaliation for filing a previous charge of discrimination with the Illinois Department of Human Rights, in violation of Section 6-101(A) of the Act. The defendants' violated plaintiff's civil rights by illegally discharging her for coming to work under the influence of alcohol and for refusing to submit to a drug and alcohol test. The defendants violated their own Employee Discipline and Due Process Policy, and Substance Abuse by Employees. The defendants improperly removed the plaintiff of her main job duties at the school to the Area Regional Office. The defendants violated her life, liberty and procedural due process rights found in the Equal Protection Clause governed by the 14th Amendment of the United States Constitution. Finally, defendant's violated plaintiff's privacy rights by obtaining plaintiff's confidential medical records without written notice or warrant.

Angela Marie Smith
June 13, 2008